

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE
ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.
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Attorney for Defendant C.R. Bard, Inc.

/s/ Derek H. Potts

Derek H. Potts

THE POTTS LAW FIRM, LLP

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Telephone: (713) 963-8881

Attorney for Plaintiffs on Exhibit A

Dated: March 20, 2017

EXHIBIT A – THE POTTS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-cv-01852	Linda L. Bray and Charles E. Bray v. C.R. Bard, Inc., et al.
2:13-cv-24840	Maria De Jesus Rizo and Trinidad Rizo v. C.R. Bard, Inc., et al.
2:13-cv-26440	Linda Kay Lloyd and William Lloyd v. C.R. Bard, Inc., et al.
2:15-cv-04003	Joyce Lee Reed v. C.R. Bard, Inc., et al.
2:15-cv-05163	Mary L. Bible and Don Bible v. C.R. Bard, Inc., et al.
2:15-cv-06965	Susan L. Keene and Richard Keene v. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.